

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MORRIS ROUTING TECHNOLOGIES,
LLC

Plaintiff,

v.

T-MOBILE USA, INC.

Defendant.

Civil Action No. 4:24-cv-00625-SDJ

JURY TRIAL DEMANDED

**DEFENDANT T-MOBILE USA, INC.’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S
FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT (DKT. NO. 14)**

Defendant T-Mobile USA, Inc. (“T-Mobile USA”) respectfully files this Unopposed Motion for Extension of Time to Respond to Plaintiff’s First Amended Complaint for Patent Infringement (Dkt. No. 14) and would show the Court as follows:

On October 4, 2024, Plaintiff Morris Routing Technologies, LLC (“MRT”) filed MRT’s First Amended Complaint for Patent Infringement (Dkt. No. 14) (“Amended Complaint”) against T-Mobile USA. T-Mobile USA’s deadline to respond to MRT’s Amended Complaint is October 18, 2024. At this time, T-Mobile USA respectfully seeks a two-week extension of time up to and including November 1, 2024, to respond to MRT’s Amended Complaint.

T-Mobile USA represents that good cause exists for this two-week extension of time to respond to MRT’s Amended Complaint. As the Court is aware, MRT recently filed multiple cases alleging patent infringement against various entities in this Court. *See Morris Routing Technologies, LLC v. AT&T Inc.*, Case No. 4:24-CV-00623-SDJ (E.D. Tex. 2024); *see also Morris Routing Technologies, LLC v. Samsung Electronics Co., Ltd.*, Case No. 4:24-CV-00624-SDJ (E.D.

Tex. 2024); *see also Morris Routing Technologies, LLC v. Verizon Communications, Inc.*, Case No. 4:24-CV-00626-SDJ (E.D. Tex. 2024). On October 4, 2024, and October 9, 2024, MRT served its Amended Complaints on T-Mobile USA and the defendants in the related cases. *See AT&T, Inc.*, Case No. 4:24-CV-00623-SDJ, Dkt. No. 16 (E.D. Tex. 2024); *see also Samsung Electronics Co., Ltd.*, Case No. 4:24-CV-00624-SDJ, Dkt. No. 12 (E.D. Tex. 2024); *see also Verizon Communications, Inc.*, Case No. 4:24-CV-00626-SDJ, Dkt. No. 19 (E.D. Tex. 2024). The defendants' deadline to move, answer, or otherwise respond to MRT's Amended Complaints in the related cases is November 1, 2024, and/or November 6, 2024. This brief extension of time for T-Mobile USA to respond to the Amended Complaint will promote greater efficiency for the parties and the Court by aligning T-Mobile USA's and the other defendants' deadlines to respond to MRT's Amended Complaint.

T-Mobile USA represents that this extension is not sought for purposes of delay but rather so that justice may be served. Counsel for T-Mobile USA met and conferred with counsel for MRT to discuss the substantive relief sought in this Motion, and counsel for MRT indicated that MRT is unopposed to the relief sought in this Motion.

T-Mobile USA's agreement with MRT should not be construed as a waiver of any other rights or defenses, including for instance, T-Mobile USA's right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

Accordingly, T-Mobile USA respectfully requests that the time in which T-Mobile USA is required to respond to MRT's Amended Complaint be extended from October 18, 2024, up to and including November 1, 2024.

Dated: October 17, 2024

Respectfully submitted,

/s/ Melissa R. Smith

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*Attorney for Defendant
T-Mobile USA, Inc.*

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for T-Mobile USA met and conferred with counsel for MRT to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). Counsel for MRT indicated that MRT is unopposed to the relief sought herein.

/s/ Melissa R. Smith

Melissa R. Smith

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on October 17, 2024.

/s/ Melissa R. Smith

Melissa R. Smith